

Carla Gowen McClurg, OSB# 165144
Trial Attorney
U.S. Department of Justice
Office of the United States Trustee
620 SW Main Street, Room 213
Portland, OR 97205
Tel: (503) 326-7659
Email: carla.mcclurg@usdoj.gov

Attorney for Gail Brehm Geiger, Acting United States Trustee for Region 18, Plaintiff

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON**

In re Cheryl Kae Stites, Debtor.	Case No. 14-35071-rld7
In re Kathleen Arthur, Debtor	Case No. 15-62393-tmr7
In re Mary Ann Michiko Roberts, Debtor	Case No. 15-63116-tmr7
United States Trustee, Plaintiff, v. Vincent Howard, Howard Law, P.C., Erik Graeff, Law Offices of Erik Graeff, P.C., Defendants.	Adversary Nos. 16-3013-rld 16-6061-rld 16-6062-rld PLAINTIFF UNITED STATES TRUSTEE'S STATEMENT REGARDING ATTORNEY FEES Trial Date: January 4-5, 2017 Trial Time: 9:00 a.m. Location: Courtroom 3

The Acting United States Trustee for Region 18, Gail Brehm Geiger ("Plaintiff"), the plaintiff in the above-referenced adversary proceedings (the "Adversary Proceedings"),

respectfully submits this Statement Regarding Attorney Fees regarding the United States Trustee's Motion to Compel Production of Documents and Data and for an Award of Expenses Against Vincent Howard, Howard Law, P.C. and Jeffrey A. Katz (the "Motion to Compel") filed on November 4, 2016 in the adversary proceeding in the case of Cheryl Kae Stites, Adversary No. 6-3013-rld (ECF. No. 45) against Vincent Howard, Howard Law, P.C. (the "Howard Defendants"), and Jeffrey Katz.

The attorney fees summarized herein are those incurred by the Plaintiff's Trial Attorney Carla Gowen McClurg associated with the Motion to Compel.

<u>Date</u>	<u>Hours</u>	<u>Description</u>	<u>Rate</u>	<u>Fees</u>
10/20/2016	0.4	Email Nick Henderson regarding log notes and document production time	\$ 170.00	\$ 68.00
10/23/2016	5.0	Prepare and redact exhibits for Santa Anna depositions	\$ 170.00	\$ 850.00
10/24/2016	2.5	Review exhibits and prepare questions	\$ 170.00	\$ 425.00
10/25/2016	1.3	Print and review outlines and review exhibits (1.2); email to Nick Henderson regarding documents (.1)	\$ 170.00	\$ 221.00
10/25/2016	2.5	Travel to airport and to Santa Anna (total time 5.0)	\$ 170.00	\$ 425.00
10/26/2016	0.5	Review notes and prepare for deposition	\$ 170.00	\$ 85.00
10/26/2016	3.0	D. Walker deposition	\$ 170.00	\$ 510.00
10/26/2016	2.0	J. Katz deposition	\$ 170.00	\$ 340.00
10/26/2016	0.3	Prepare draft email regarding documents	\$ 170.00	\$ 51.00
10/26/2016	0.4	Review and forward Kamitsuka deposition request	\$ 170.00	\$ 68.00
10/27/2016	1.7	Meeting with B. Smith regarding MD data and documents	\$ 170.00	\$ 289.00
10/27/2016	0.5	Travel to Madison Spach's office (total time .5)	\$ 170.00	\$ 85.00
10/27/2016	0.4	Meet with Madison Spach	\$ 170.00	\$ 68.00
10/27/2016	5.7	Travel time and flight delay (9.0 total, bill half); draft letter to B. Smith (1.0); email regarding failure to produce documents (.2)	\$ 170.00	\$ 969.00
11/1/2016	0.2	Telephone conference with Nick Henderson	\$ 170.00	\$ 34.00

11/2/2016	4.9	Work on Motion to Compel (4.0); Review response by Howard to Stites RFPD (.5); Order 10/4/16 hearing audio (.1); listen to 10/4 audio (.3)	\$ 170.00	\$ 833.00
11/3/2016	2.5	Prepare declaration and exhibits	\$ 170.00	\$ 425.00
11/4/2016	0.7	Review and finalize (.5); file (.2)	\$ 170.00	\$ 119.00
12/1/2016	0.3	Review Howard response	\$ 170.00	\$ 51.00
12/7/2016	2.1	Prepare for hearing on case status, MSJ, and UST motion to compel (1.5); attend hearing (.6)	\$ 170.00	\$ 357.00
12/10/2016	0.7	Work on exhibits regarding motion to compel, including underlining Howard depo transcript.	\$ 170.00	\$ 119.00

Total Fees

\$ 6,392.00

DATED this 19th day of December, 2016.

Respectfully submitted,
GAIL BREHM GEIGER
Acting U.S. Trustee for Region 18

/s/ Carla Gowen McClurg
Carla Gowen McClurg, OSB# 165144
Trial Attorney

CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2016 I served a copy of the foregoing PLAINTIFF UNITED STATES TRUSTEE'S STATEMENT REGARDING ATTORNEY FEES by mailing a copy of this document, by United States first class mail, postage prepaid, addressed to the following:

Jeffrey A. Katz
1919 N. Heliotrope Dr.
Santa Ana, CA 92706

Vincent Howard
2099 S. State College Blvd., Suite 600
Anaheim, CA 92806

Howard Law, P.C.
Vincent Howard
2099 S State College Blvd #600
Anaheim, CA 92806

GAIL BREHM GEIGER
Acting U.S. Trustee for Region 18

/s/ Carla Gowen McClurg
Carla Gowen McClurg, OSB# 165144
Trial Attorney